Message

From: STEVE LAWRY [lawrylts@sbcglobal.net]

Sent: 11/24/2014 10:06:55 PM

To: Karlson, Kristine [Karlson.Kristine@epa.gov]; Chew, Sandra [Chew.Sandra@epa.gov]; Pennington, Shelby G

[shelby.g.pennington@exxonmobil.com]; Bromley, Eugene [Bromley.Eugene@epa.gov]

CC: Sauer Steven [sss70sss@gmail.com]
Subject: Re: any comments on Exxon preprints?

Thanks for the input Kristine. I understand we can add to the comments section at the bottom of each DMR and intend to do so when and as necessary. With that said, it is still very convenient and time saving to have the changes made on the forms Sandra is currently updating so we don't have to add the same comments every month. If something changes, any comments in the comments section will be changed subsequently. Once Sandra is done with these, my plan is to save the DMR forms for each platform as a template to be used each quarter and merely change the reporting dates at the top as well as any new monitoring results. To do this we would use Adobe Pro so we can edit the PDFs, while being careful not to alter EPA's format. By doing this, Sandra would not need to send new quarterly DMR forms for everyone unless the Permittee requests one. Will this work for EPA?

BTW: Sandra, we finished reviewing Beta Offshore's DMRs today and forwarded to Marina Robertson. She should have them to you soon. The last ones are for POOI and we hope to have them later this week.

Feel free to call me too if you'd like and we can discuss in more detail. Thanks again for all the help and best regards,

Steven G. Lawry Environmental and NPDES Compliance Specialist State Certified Potable Water Distribution Operator Marine Biologist, LTS Environmental, Inc. (805) 644-4560

From: "Karlson, Kristine" <Karlson.Kristine@epa.gov>

To: "Chew, Sandra" <Chew.Sandra@epa.gov>; "Pennington, Shelby G" <shelby.g.pennington@exxonmobil.com>;

"Bromley, Eugene" <Bromley.Eugene@epa.gov>Cc: STEVE LAWRY <lawrylts@sbcglobal.net>Sent: Monday, November 24, 2014 12:26 PM Subject: RE: any comments on Exxon preprints?

Hi, All — I'd like to chime in with another issue that Sandra, Eugene and I discussed the other day, which is that the comments section is really meant for the permittee. In other words, it is your portion of the form in which to note any anomalies, additional sample results that won't fit, explanations for excursions, etc. That means that we don't have to fix every one of your issues with the comments... you are supposed to be able to add comments whenever your submit DMRs. In fact, if we add comments as a permanent feature, and your facility or process changes such that the comments become out-of-date, they may no longer reflect the facility or your sample results. This is one of the issues I wanted to discuss with you this week, Steve.

Thanks, Kristine

Kristine Karlson (415) 947-4297 From: Chew, Sandra

Sent: Monday, November 24, 2014 9:50 AM **To:** Pennington, Shelby G; Karlson, Kristine

Cc: STEVE LAWRY

Subject: RE: any comments on Exxon preprints?

Hi Shelby,

I have reviewed your changes and additional comments to the Exxon platforms. There are several comments that are too long to include in the comment section. If you can shorten these comments, I will be able to include them.

The following comments that are found in your document and needs to be shorten are:

- (002) Produced Water 1. a. and c.

- (005) Sanitary and Domestic Waste 1. a.

SANDRA CHEW

U.S. EPA REGION 9 INFORMATION MANAGEMENT SECTION, ENF-4-1 75 HAWTHORNE STREET SAN FRANCISCO, CA 94105 (415) 972-3335

From: Pennington, Shelby G [mailto:shelby.g.pennington@exxonmobil.com]

Sent: Thursday, November 20, 2014 11:54 AM

To: Karlson, Kristine; Chew, Sandra

Cc: STEVE LAWRY

Subject: RE: any comments on Exxon preprints?

Kristine and Sandra-

Please see attached DMR comments for ExxonMobil.

Shelby G. Pennington ExxonMobil Production Company USP Regulatory Specialist Office: 832-625-4550

Cell: 281-723-9353

From: Karlson, Kristine [mailto:Karlson.Kristine@epa.gov]

Sent: Tuesday, November 18, 2014 5:03 PM **To:** Pennington, Shelby G; STEVE LAWRY

Cc: Chew, Sandra

Subject: any comments on Exxon preprints?

Hi, Shelby and Steve –

Sandra has received a list of issues from Steve concerning the preprinted DMRs for another operator (Freeport-McMoRan). It is our assumption that the same issues apply to Exxon's preprints, and Sandra plans to make changes accordingly. If this is not the case, please advise us ASAP, as

Hondo's reporting deadline is fast approaching (Dec 28) and we'd like to address as much as possible before then.

Thanks, Kristine

Kristine Karlson USEPA Region 9, Enforcement Division 75 Hawthorne St ENF-3-1 San Francisco, CA 94105 (415) 947-4297